

## MEMO ENDORSED



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**June 16, 2021**

***Via ECF***

Hon. Kenneth M. Karas, USDJ  
300 Quarropas Street, Chambers 533  
White Plains, NY 10601-4150

**Re:** The ProImmune Company, LLC v Holista Colltech Ltd. et al.  
**Docket No.:** 7:20-cv-1247(KMK)  
**Subject:** APPLICATION TO APPROVE SEALED FILINGS AND  
PUBLICLY FILE REDACTED FILINGS

Dear Judge Karas,

The undersigned is the attorney for defendant-counterclaim plaintiff Holista Colltech Ltd (“Defendant” or “Holista”). The letter motion seeks an Order formally approving the sealing of ECF Doc. Nos. 44 and 47, which consist of two declarations along with several exhibits that plaintiff ProImmune Company, LLC had sought redactions on.

By way of Background, ProImmune filed a letter motion on June 8, 2021 (ECF Doc. 42) that proposed “that *both parties* redact the specific information in the evidence submitted, as well as the briefing for their respective summary judgment motions, supporting declarations, and Local Rule 56.1 separate statements.” (*Emphasis added.*) Therefore, when this letter motion was Memo Endorsed on June 10, 2021, the undersigned believed (perhaps mistakenly) that Holista was also given permission to file certain agreed upon summary judgment submissions under seal.

Accordingly, on June 14, 2021 the undersigned publicly filed its Rule 56.1 statement and memorandum of law, but filed ECF Doc. Nos. 44 and 47 under seal because these two declarations included exhibits that parties agreed to redact.

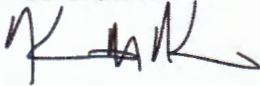
Accordingly, the instant motion is being filed to formally obtain a sealing order allowing ECF Doc. Nos. 44 and 47 to remain as sealed filings as well as permission to publicly file redacted versions of ECF Doc. 44 and 47.

Respectfully submitted,  
**TURTURRO LAW, P.C.**  
By: /s/ Natraj S. Bhushan

To (via ECF): Ryan Abbot & Rowenakete P. Barnes

Application is granted.

So Ordered.



6/17/21